

EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

TIMOTHY KING, MARIAN ELLEN
SHERIDAN, JOHN EARL HAGGARD,
CHARLES JAMES RITCHARD, JAMES
DAVID HOOPER, and DARREN WADE
RUBINGH,

Plaintiffs,

v

No. 2-20-cv-13134

HON. LINDA V. PARKER

MAG. R. STEVEN WHALEN

GRETCHEN WHITMER, in her official
capacity as Governor of the State of
Michigan, JOCELYN BENSON, in her
official capacity as Michigan Secretary of
State and the Michigan BOARD OF STATE
CANVASSERS,

Defendants,

CITY OF DETROIT,

Intervening Defendant,

ROBERT DAVIS,

Intervening Defendant,

DEMOCRATIC NATIONAL
COMMITTEE and MICHIGAN
DEMOCRATIC PARTY,

Intervening Defendant.

**AFFIDAVIT OF HEATHER S.
MEINGAST IN SUPPORT OF
DEFENDANTS WHITMER
AND BENSON'S MOTION
FOR SANCTIONS**

**AFFIDAVIT OF HEATHER S. MEINGAST IN SUPPORT OF
DEFENDANTS WHITMER AND BENSON'S MOTION FOR SANCTIONS**

I, Assistant Attorney General Heather S. Meingast, being duly sworn,
voluntarily state as follows:

1. I have been licensed to practice law in the State of Michigan since 1998.
2. I primarily practice law in Ingham County, Michigan.
3. I have worked for the Michigan Department of Attorney General since February 2004.
4. During my nearly 17 years with the office, I have worked in the Department's Public Employment, Elections and Tort Division as well as in the Appellate Division and was formerly the Division Chief of the Opinions Division. During these years, I frequently handled election cases in state and federal court and at the trial court and appellate level.
5. I am presently the Division Chief for the Civil Litigation, Employment and Elections Division, and have held this position since February 2019. In this position, I supervise five attorneys, including Assistant Attorney General Erik A. Grill.
6. During my time with the office, I have routinely defended state officers and agencies in numerous election cases and other complex litigation involving constitutional issues in federal court and at the trial court and appellate level in federal court. Recent cases include *Texas v. Pennsylvania, et al.*, U.S. Supreme Court No. 20-220155; *King, et al. v. Whitmer, et al.*, Case No. 20-13134 (E.D. Mich. 2020); *Esshaki, et al v. Whitmer, et al.*, Case No. 20-10831 (E.D. Mich. 2020); *Priorities U.S.A. v. Nessel*, Case No. 20-1931 (E.D. Mich. 2020); *Detroit Unity, et al. v. Whitmer, et al.*, Case No. 20-12016 (E.D. Mich. 2020); *Kishore, et al. v. Whitmer, et al.*, Case No. 20-1661 (E.D. Mich. 2020); *SawariMedia, L.L.C. v. Witmer, et al.*, Case No. 20-1594 (E.D. Mich. 2020).
7. Assistant Attorney General Grill and I worked together researching and drafting the various submissions filed by Defendants Whitmer, Benson, and

the Board of State Canvassers in this matter, with each of us handling different issues and working on separate parts of the submissions.

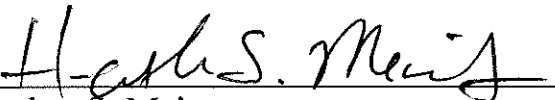
8. To the best of my recollection, the following chart accurately reflects the time I personally spent on various activities performed in defense of this matter:

Date	Activity	Hours
11/27/20	Review Plaintiffs' Complaint (ECF No. 1)	1.0
11/27/20	Email to clients re: new filing	0.20
11/30/20	Review Plaintiffs' Amended Complaint and exhibits (ECF No. 6)	2.0
11/30/20	Review Plaintiffs' emergency motion for declaratory judgment and injunctive relief (ECF No. 7)	1.0
12/1/20	Email to clients updating on case and service	0.1
12/2/20	Email to clients advising of due date for response to injunction motion	0.1
12/2/20	Legal research on mootness and abstention doctrines	1.0
12/2/20	Draft portions of Defendants' response to Plaintiffs' emergency motion for declaratory and injunctive relief, including introduction, statement of facts, mootness and abstention arguments, and state law claims (ECF No. 31)	4.0
12/2/20	Review and edit Brater Declaration in support of Defendants' Response to Plaintiffs' emergency motion for declaratory and injunctive relief	0.5
12/2/20	Email to clients with draft of response brief	0.1
12/2/20	Review and edit draft of Defendants' Response to Plaintiffs' emergency motion for declaratory and injunctive relief before filing (ECF No. 31)	0.75
12/2/20	Review and edit response to emergency motion to seal (ECF No. 35)	0.3
12/2/20	Emails to clients with filed briefs	0.1

12/7/20	Review December 7, 2020, Opinion & Order (ECF No. 62)	0.5
12/7/20	Emails to clients attaching December 7 Opinion & Order	0.1
12/22/20	Review and edit Defendants' motion to dismiss and brief for filing (ECF No. 70)	1.5
1/14/21	Review voluntary dismissal and email clients with update	0.3
1/27/21	Begin drafting motion and brief in support of sanctions (ECF No. 105)	2.5
1/28/21	Finish drafting motion and brief for sanctions; file motion and brief along with exhibits (ECF No. 105)	3.5
2/12/21	Review Plaintiffs' response to Defendants' motion for sanctions (ECF No. 112)	1.0
3/10/21	Begin drafting reply brief in support of Defendants' motion for sanctions (ECF No. 116)	1.75
3/11/21	Finish drafting and file reply brief in support of Defendants' motion for sanctions (ECF No. 116)	3.0
4/6/21	Review and file motion to file supplemental brief in support of Defendants' motion for sanctions and proposed supplemental brief (ECF No. 118)	1.0
7/11/21	Prepare for July 12 hearing by reviewing all parties' briefing and cited cases	3.5
7/12/21	Attend July 12, 2021, hearing on all motions for sanctions	6.0
8/3/21	Review Plaintiffs' supplemental briefs (ECF Nos. 161, 165)	1.0
8/4/21	Draft and file Defendants' response to Plaintiffs' supplemental briefs (ECF No. 166)	1.75

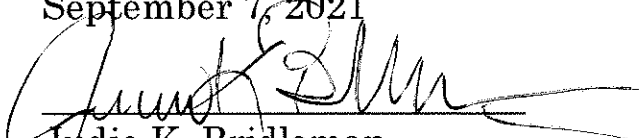
Total Hours	38.55
Reasonable rate ¹	\$395/hr
Total Attorney Fees/Costs	\$15,227.25

I declare under penalty of perjury that the foregoing is true and correct.


Heather S. Meingast

Dated: September 7, 2021

Subscribed and sworn to before me
September 7, 2021


Judie K. Bridleman
Notary Public
Eaton County, Michigan
Acting in Ingham County, Michigan
My commission expires: 11.30.2021

¹ Based on the State Bar of Michigan's 2020 Economics of Law Practice in Michigan Survey, the median and mean billing rates for election law attorneys in the Lansing area is \$300 and \$395 respectively. See <https://www.michbar.org/file/pmrc/articles/0000156.pdf>. Given my years of experience and supervisory position, an hourly rate of \$395 is reasonable in this matter.